

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA

v.

**JAMES LAEL JENSEN
MAXWELL STERLING JENSEN
a/k/a “Max”
KELLY ANNE JENSEN
ZACHARY GOLDEN JENSEN**

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Case No. 1:25:cr-257

**DEFENDANT MAXWELL STERLING JENSEN’S MOTION FOR PRETRIAL NOTICE OF
404(b) EVIDENCE**

TO THE HONORABLE COURT:

Defendant Maxwell Sterling Jensen, through his counsel, Robert L Guerra, Jr., files this Motion for Pretrial Notice under Federal Rule of Evidence 404(b) and in support would respectfully show:

Federal Rule of Evidence 404(b) provides: “Upon request by the accused, the prosecution in a criminal case shall provide reasonable notice in advance of trial... of the general nature of any such evidence it intends to introduce at trial.”

The Government has not given such notice nor specified what Rule 404(b) evidence, if any, it will seek to introduce at trial. This Defendant, therefore, has been prevented from filing appropriate motions addressing such evidence, if it indeed exists.

The Jury Selection for this case is set for June 16, 2025, with Pretrial on June 3, 2025. Defendant hereby requests a hearing on this matter and that the Government be required to produce all evidence that it intends to use at the time of trial and for impeachment purposes no later than 20 days before trial.

Certificate of Conference

Pursuant to S.D. Tex. Cr. LR 12.2, counsel for Maxwell Sterling Jensen attempted to confer with Assistant United States Attorney Laura Garcia, as to her position in this Motion and as of the time of this filing was unable to confer.

Prayer

Defendant, therefore, respectfully requests that the Court grant this Motion. If the Court deems it necessary, Defendant requests the Court set a hearing to consider further evidence and arguments in this matter.

Respectfully submitted,

LAW OFFICE OF ROBERT GUERRA, PLLC

By: /s/ Robert L. Guerra, Jr.
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MAXWELL STERLING JENSEN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via e-mail on this 15th day of May 2025 to the following:

Ms. Laura Garcia Assistant United States Attorney United States Attorney's Office 600 E. Harrison, Rm 201 Brownsville, Texas 78520 Ph: (956) 548-2554 Email: laura.garcia@usdoj.gov	<table><tr><td>_____</td><td>Regular Mail</td></tr><tr><td>_____</td><td>Certified Mail, RRR</td></tr><tr><td>_____</td><td>Hand Delivery</td></tr><tr><td>_____</td><td>Facsimile</td></tr><tr><td>_____ X _____</td><td>Electronic Mail</td></tr></table>	_____	Regular Mail	_____	Certified Mail, RRR	_____	Hand Delivery	_____	Facsimile	_____ X _____	Electronic Mail
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/s/ Robert L. Guerra, Jr.

ROBERT L. GUERRA, JR.